

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT**

**American Colloid Company
Tell City Industrial Park
Troy, Indiana 47588**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F123-12215-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a commercial coal grinding and clay blending plant that manufactures additives.

Authorized individual:	Chuck McAulay
Source Address:	Tell City Industrial Park, Troy, Indiana, 47588
Mailing Address:	PO Box 160, Belle Fourche, SD 57717
SIC Code:	3295
Source Location Status:	Perry
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) Coal bulk unloading, handling and storage operation, constructed July 30, 1998, with a maximum capacity of 48 tons per hour (TPH), using a baghouse (BH-13) for PM and PM10 control, and exhausting to a point designated as DC-6, inside the building;
- (b) one (1) Coal milling operation, constructed July 30, 1998, with a maximum capacity of 10 TPH, using a baghouse (BH-14) for PM and PM10 control, and exhausting to a point designated as DC-1, inside the building;
- (c) one (1) Coal screening operation, constructed July 30, 1998, with a maximum capacity of 10 TPH, using a baghouse (BH-15) for PM and PM10 control, and exhausting to a point designated as DC-7, inside the building;
- (d) one (1) Raw materials unloading operation, constructed July 30, 1998, with a maximum capacity of 32 TPH, using a baghouse (BH-01) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-5;
- (e) one (1) Raw materials storage tank identified as Tank A, constructed July 30, 1998, with a maximum capacity of 32 TPH, using a baghouse (BH-02) for PM and PM10 control, and exhausting to a point designated as BV-A, inside the building;
- (f) one (1) Raw materials storage tank identified as Tank C, constructed July 30, 1998, with a maximum capacity of 32 TPH, using a baghouse (BH-03) for PM and PM10 control, and exhausting to a point designated as BV-C, inside the building;

- (g) one (1) Raw materials storage tank identified as Tank B&D, constructed July 30, 1998, with a maximum capacity of 32 TPH, using a baghouse (BH-04) for PM and PM10 control, and exhausting to a point designated as BV-BD, inside the building;
- (h) one (1) Elevator Conveyer identified as # 1, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-17) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-1;
- (i) one (1) Elevator Conveyer identified as # 2, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-18) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-2;
- (j) one (1) Blender/Lump breaker operation, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-05) for PM and PM10 control, and exhausting to a point designated as DC-4 inside the building;
- (k) one (1) Materials transfer operation, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-12) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-8;
- (l) one (1) Blender elevator, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-06) for PM and PM10 control, and exhausting to a point designated as BV-3, inside the building;
- (m) one (1) Outbound storage tank, constructed July 30, 1998, with a maximum capacity of 35 TPH, using a baghouse (BH-789) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-4;
- (n) One (1) Product loadout operation, constructed July 30, 1998, with a maximum capacity of 100 TPH, using a baghouse (BH-10) for PM and PM10 control, and exhausting to a point designated as DC-3, inside the building; and
- (o) One (1) Packaging operation, constructed July 30, 1998, with a maximum capacity of 7 TPH, using a baghouse (BH-11) for PM and PM10 control, and exhausting to one (1) stack, designated as DC-2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also

furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40

CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied;

- (3) An automatic measurement was taken when the process was not operating;
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, ~~and~~ the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) one (1) Coal bulk unloading, handling and storage operation, with a maximum capacity of 48 tons per hour (TPH), using a baghouse (BH-13) for PM and PM10 control, and exhausting to a point designated as DC-6, inside the building;
- (b) one (1) Coal milling operation, with a maximum capacity of 10 TPH, using a baghouse (BH-14) for PM and PM10 control, and exhausting to a point designated as DC-1, inside the building;
- (c) one (1) Coal screening operation, with a maximum capacity of 10 TPH, using a baghouse (BH-15) for PM and PM10 control, and exhausting to a point designated as DC-7, inside the building;
- (d) one (1) Raw materials unloading operation, with a maximum capacity of 32 TPH, using a baghouse (BH-01) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-5;
- (e) one (1) Raw materials storage tank identified as Tank A, with a maximum capacity of 32 TPH, using a baghouse (BH-02) for PM and PM10 control, and exhausting to a point designated as BV-A, inside the building;
- (f) one (1) Raw materials storage tank identified as Tank C, with a maximum capacity of 32 TPH, using a baghouse (BH-03) for PM and PM10 control, and exhausting to a point designated as BV-C, inside the building;
- (g) one (1) Raw materials storage tank identified as Tank B&D, with a maximum capacity of 32 TPH, using a baghouse (BH-04) for PM and PM10 control, and exhausting to a point designated as BV-BD, inside the building;
- (h) one (1) Elevator Conveyer identified as # 1, with a maximum capacity of 35 TPH, using a baghouse (BH-17) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-1;
- (i) one (1) Elevator Conveyer identified as # 2, with a maximum capacity of 35 TPH, using a baghouse (BH-18) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-2;
- (j) one (1) Blender/Lump breaker operation, with a maximum capacity of 35 TPH, using a baghouse (BH-05) for PM and PM10 control, and exhausting to a point designated as DC-4 inside the building;
- (k) one (1) Materials transfer operation, with a maximum capacity of 35 TPH, using a baghouse (BH-12) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-8;
- (l) one (1) Blender elevator, with a maximum capacity of 35 TPH, using a baghouse (BH-06) for PM and PM10 control, and exhausting to a point designated as BV-3, inside the building;
- (m) one (1) Outbound storage tank, with a maximum capacity of 35 TPH, using a baghouse (BH-789) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-4;
- (n) one (1) Product loadout operation, with a maximum capacity of 100 TPH, using a baghouse (BH-10) for PM and PM10 control, and exhausting to a point designated as DC-3, inside the building; and
- (o) one (1) Packaging operation, with a maximum capacity of 7 TPH, using a baghouse (BH-11) for PM and PM10 control, and exhausting to one (1) stack, designated as DC-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart Y]

Pursuant to the New Source Performance Standards, 326 IAC 12, and 40 CFR 60.250 through 60.254, Subpart Y. Permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system, processing coal gases which exhibit 20 percent opacity or greater.

D.1.2 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart OOO]

Pursuant to the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.670 through 60.676, Subpart OOO, the permittee shall control particulate emissions from:

- (1) Exhausts DC-5, BV-A, BV-C, BV-BD, BV-1, BV-2, DC-04, DC-08, BV-3, BV-04, DC-3, and DC-2 shall be limited to:
 - (A) 0.05 g/dscm; and
 - (B) 7 percent opacity
- (2) Transfer points fugitive emissions shall be limited to 10% opacity.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate emissions from the following facilities shall be limited as follows:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions 326 IAC 6-3-2 (lb/hr)
Coal unloading, handling and storage operation (DC-6)	48	44.2
Coal milling operation (DC-1)	32	19.1
Coal screening operation (DC-7)	32	19.1
Raw materials unloading operation (DC-5)	32	40.5
Raw materials storage tank A (BV-A)	32	40.5
Raw materials storage tank C (BV-C)	32	40.5
Raw materials storage tank B&D (BV-BD)	32	40.5
Elevator conveyer # 1 (BV-1)	35	41.3
Elevator conveyer # 2 (BV-2)	35	41.3
Blender/lump breaker operation (DC-4)	35	41.3
Materials transfer operation (DC-8)	35	41.3
Blender elevator (BV-3)	35	41.3
Outbound storage tanks (BV-4)	35	41.3
Product loadout operation (DC-3)	100	51.3
Packaging operation (DC-2)	7	15.1

Total (lb/hr)		558.6
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D.1.4 PSD [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), the source will limit PM emissions to less than 250 tons per year and will render 326 IAC 2-2 (PSD) not applicable. The source will be in compliance with the limitation by controlling PM emissions with baghouses. PM emissions are limited as follows:

Emission Unit	Allowable PM Emissions (lb/hr)
Coal unloading, handling and storage operation (DC-6)	29.25 (1)
Coal milling operation (DC-1)	12.64 (1)
Coal screening operation (DC-7)	12.64 (1)
Raw materials unloading operation (DC-5)	0.41 (2)
Raw materials storage tank A (BV-A)	0.17 (2)
Raw materials storage tank C (BV-C)	0.17 (2)
Raw materials storage tank B&D (BV-BD)	0.17 (2)
Elevator conveyer # 1 (BV-1)	0.10 (2)
Elevator conveyer # 2 (BV-2)	0.10 (2)
Blender/lump breaker operation (DC-4)	0.17 (2)
Materials transfer operation (DC-8)	0.20 (2)
Blender elevator (BV-3)	0.10 (2)
Outbound storage tanks (BV-4)	0.15 (2)
Product loadout operation (DC-3)	0.17 (2)
Packaging operation (DC-2)	0.41 (2)
Total (lb/hr)	56.85

Note: (1) PM allowable emissions for these facilities are truncated from 326 IAC (6-3-2) allowable PM emissions, such that the source wide PM emissions are less than 250 tons/yr to ensure that the requirements of 326 IAC 2-2 (PSD) do not apply.
(2) PM allowable emissions based on 40 CFR 60.670 Subpart OOO PM emission limit of 0.022 gr/dscf.

D.1.5 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with baghouses. PM10 emissions are limited as follows:

Emission Unit	Allowable PM-10 Emissions (lb/hr)
Coal unloading, handling and storage operation (DC-6)	10.87 (3)
Coal milling operation (DC-1)	4.70 (3)
Coal screening operation (DC-7)	4.70 (3)

Raw materials unloading operation (DC-5)	0.41
Raw materials storage tank A (BV-A)	0.17
Raw materials storage tank C (BV-C)	0.17
Raw materials storage tank B&D (BV-BD)	0.17
Elevator conveyer # 1 (BV-1)	0.10
Elevator conveyer # 2 (BV-2)	0.10
Blender/lump breaker operation (DC-4)	0.17
Materials transfer operation (DC-8)	0.20
Blender elevator (BV-3)	0.10
Outbound storage tanks (BV-4)	0.15
Product loadout operation (DC-3)	0.17
Packaging operation (DC-2)	0.41
Total (lb/hr)	22.59

(3) PM10 allowable emissions for these facilities are truncated, such that the source wide PM10 emission is less than 100 tons/yr to ensure that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers (#1 and # 2), blender elevator, outbound storage tank, product loadout and packaging facilities and its control devices.

Compliance Determination Requirements

D.1.7 Particulate Matter (PM) and (PM10)

The baghouses for PM and PM10 control shall be in operation at all times that the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers (#1 and # 2), blender elevator, outbound storage tank, product loadout and packaging facilities are in operation.

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

During the period between 36 and 42 months after issuance of this permit, in order to demonstrate compliance with Condition D.1.4, the Permittee shall perform PM testing for Raw materials unloading (DC-5), Elevator Conveyers #1 and #2 (BV-1 and BV-2), Materials transfer operation (DC-8), Outbound storage tank (BV-4) and Packaging operation (DC-2) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the raw materials unloading (DC-5), materials transfer (DC-8), elevator conveyers (#1 (BV-1) and # 2 (BV-2)), outbound storage tank (BV-4), and packaging (DC-2) facilities stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the operations, at least once per working shift when the coal bulk unloading, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyer, blender elevator, outbound storage tank and product loadout facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.11 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers (#1 and # 2), blender elevator, outbound storage tank, product loadout and packaging when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers (#1 and # 2), blender elevator, outbound storage tank, product loadout and packaging facilities stack exhausts.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: American Colloid Company
Source Address: Tell City Industrial Park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: American Colloid Company
Source Address: Tell City Industrial Park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9

This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: American Colloid Company
Source Address: Tell City Industrial park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document for a Federally Enforceable State Operating
Permit (FESOP)

Source Name: American Colloid Company
Source Location: Tell City Industrial Park, Troy, IN 47588
SIC Code: 3295
County: Perry
Operation Permit No.: F123-12215-00021
Permit Reviewer: Adeel Yousuf /EVP

On August 17, 2000, the Office of Air Management (OAM) had a notice published in the Perry County News, Troy, Indiana, stating that American Colloid Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a commercial coal grinding and clay blending plant. The notice also stated that OAM proposed to issue a FESOP Permit for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On September 1, 2000, Chuck McAulay from American Colloid Company submitted comments on the proposed FESOP Permit. The summary of the comments and corresponding responses is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment # 1

Condition A.3

It is our position the bag filters that discharge inside a building should be considered insignificant. The definition of insignificant references the "potential" emissions of a process or control device. These units do not discharge to atmosphere and, until they are routed to exhaust outside, there are no potential emissions. At a minimum the enclosures should be considered to be a high-efficiency control device on the units, bringing the potential emissions to well below the thresholds and be considered insignificant.

Response # 1

Pursuant to 326 IAC 2-7-1(21)(B), an emission unit or activity with PM-10 emissions greater than five (5) pounds per hour or twenty five (25) pounds per day can not be considered an insignificant activity. All the activities listed in section A.2 have potential uncontrolled PM-10 emissions greater than five (5) pounds per hour. Also, the operation is being evaluated not the baghouse, since the operation can operate without the baghouse, it can not be considered insignificant. No changes were made to the permit as a result of this comment.

American Colloid Company.
Troy, Indiana
Permit Reviewer: AY/EVP

F123-12215-00021

Comment # 2

Condition B.13

I request that B.13(a)(3) be deleted. The type and number of spare parts at a facility is under a constant flux, and in our case is maintained in a computerized PM program. I also don't feel it is the duty of IDEM to monitor spare parts information, but rather to establish limits per existing laws and review the compliance monitoring activities of an organization.

Response # 2

Condition B.13 (a)(3) contains the minimum elements of Preventive Maintenance Plans (PMP) as described by the applicable rule 326 IAC 1-6-3 (a)(3). Neither the condition nor the rule, require that the number of spare parts be fixed. Maintaining the availability of parts by means of a computerized PM program and implementing that program as necessary to comply with condition B.13 (b) should satisfy the requirements of B.13. No changes were made to the permit as a result of this comment. However, upon further review, OAM has decided to revise B.13 to include new paragraph (d) which clarifies the record keeping requirements associated with this condition.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~it's~~ **the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM,

OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

Comment # 3

Condition C.20

Because this is a new small facility and the condition of all the pollution abatement equipment excellent, I request the report in C.20(a) be required on an annual basis and not a semi-annual basis.

Response # 3

Pursuant to 326 IAC 2-8-4(3)(C)(i), reports of any required monitoring must be submitted at least every six (6) months. Also, the source is not considered a small facility and subjects to Title V but opted to be FESOP. No changes were made to the permit as a result of this comment. However, upon further review, OAM has decided to revise condition C.20 such that the Semi-Annual Compliance Monitoring Report is referred to as the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been removed from this condition and, instead, placed into Condition B.13. Paragraph (d) has been revised to clarify that the report does need to be certified by the responsible official, and this change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit **a the attached Semi-annual Quarterly Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from the permit requirements, and the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

- ~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Comment # 4

Conditions D.1.2 - D.1.4

There are three different particulate emissions limits identified in these paragraphs. I request the paragraphs be revised to indicate only the applicable limit for each process and indicate the reason for the limit.

Response # 4

Condition D.1.2 establishes the requirements pursuant to the NSPS Subpart OOO. Condition D.1.3 contains PM emission limitations pursuant to the 326 IAC 6-3-2. Condition D.1.4 is required to limit the source wide PM emissions to less than 250 tons per year, making 326 IAC 2-2 (PSD) review inapplicable. These limitations are in direct proportion to those established by condition D.1.3. The allowable PM emissions in condition D.1.4 are the limits to be observed by the source since the allowable emissions for D.1.4 are either the same or more stringent than the limits in conditions D.1.2 and D.1.3. No changes were made to the permit as a result of this comment.

Comment # 5

Condition D.1.8

The discharge of the filter is not accessible and not equipped with a stack that can be tested utilizing EPA methods. To allow for testing, a stack will probably have to be installed that discharges outside the building, something we do not want to do. I request that testing only be required if stack is vented to the atmosphere.

Response # 5

OAM has decided that no testing is required for the facilities that have no stacks venting to the atmosphere. However, pursuant to NSPS Subpart OOO, all the facilities that vent to the atmosphere must be tested to show compliance with the rule. Upon further review, OAM has decided to revise D.1.8 to clarify the condition to which the compliance testing requirement is related, and to provide general language in terms of the appropriate test methods to be utilized. The following changes have been made to the Section D.1.8 of the permit.

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

During the period between 36 and 42 months after issuance of this permit, **in order to demonstrate compliance with Condition D.1.4**, the Permittee shall perform PM testing for **Raw materials unloading operation (DC-5), Elevator Conveyers #1 and # 2 (BV-1 and BV-2), Materials transfer operation (DC-8), Outbound storage tank (BV-4) and Packaging operation (DC-2)** ~~Coal unloading, handling and storage operation (DC-6) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. The Permittee is not required to test other facilities regulated by 40 CFR 60, subpart 000. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM and PM10 limit specified in Conditions D.1.3 and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Comment # 6

Condition D.1.10

This permit requires action if the pressure drop across a baghouse is not within a range of 3-6 in. Water. I request that the upper limit be deleted from the permit. A high pressure drop reading indicates that the bag filter may be getting an excessive cake layer on the bags, that the frequency of the cleaning cycle be increased, that the pressure switch be changed, etc. The point is that high pressure drop in no way indicated increased emissions; if anything a higher pressure drop indicates a higher removal efficiency. The only consequence of a higher than normal pressure drop across a baghouse may be a reduction of production through a process and should not require action unless the facility feels it necessary.

Response # 6

IDEM believes that the pressure drop across a baghouse, in addition to visible emissions, is a key parameter in determining the performance of the baghouse. OAM considers both upper and lower limits of pressure drops are important factors in determining whether the baghouse is operating properly. A pressure drop reading below the specifications would indicate the existence of holes or tears in the bag. A pressure drop higher than the upper limit would indicate the clogging or an excessive cake layer on the bags which may cause the malfunction of the control device and eventually lead to uncontrolled PM escaping from the emission points. No changes were made to the permit as a result of this comment. However, upon further review, OAM has decided to revise D.1.10 (Parametric Monitoring) to include the language specifying that failure to take response steps will be considered a permit violation.

D.1.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the operations, at least once per working shift when the coal bulk unloading, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyer, blender elevator, outbound storage tank and product loadout facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge **and Other Instrument** Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Comment # 7

Condition D.1.13

I request that "Weekly" in condition D1.13(b)(1) be deleted. The required monitoring and maintenance activities are of daily, weekly and quarterly frequencies and will be maintained at those frequencies.

Response # 7

The rule provisions governing the content of FESOPs are contained at 326 IAC 2-8-4. Pursuant to 326 IAC 2-8-4(3), each FESOP is required to contain, "Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements". OAM believes that for most types of processes, monitoring no less frequently than once per shift is necessary to "evaluate continuous compliance". Condition D.1.9(a) has been revised accordingly. Upon further review, OAM has decided to revise D.1.9 (e) to include the language specifying that failure to take response steps will be considered a permit violation.

D.1.9 Visible Emissions Notations

- (a) ~~Daily~~ Visible emission notations of the raw materials unloading (DC-5), materials transfer (DC-8), elevator conveyers (#1 (BV-1) and # 2 (BV-2)), outbound storage tank (BV-4), and packaging (DC-2) facilities stack exhausts shall be performed **once per shift** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

Condition D.1.13 was also revised as follows to correct the referenced condition and to make the frequency of data recording consistent, and also to simplify the source record keeping relating to the cleaning cycle operation, and other extraneous requirements as paragraphs (b)(2)-(7) have been deleted.

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition **D.1.9** ~~D.1.7~~, the Permittee shall maintain records of daily visible emission notations of the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers (#1 and # 2), blender elevator, outbound storage tank, product loadout and packaging facilities stack exhausts.
- (b) To document compliance with Condition **D.1.10** ~~D.1.8~~, the Permittee shall maintain the following:
 - (1) **Weekly Once per shift** records of the following operational parameters during normal operation when venting to the atmosphere:

- (A) Inlet and outlet differential static pressure; and
- (B) Cleaning cycle operation. ~~frequency and differential pressure~~
- (2) ~~Documentation of all response steps implemented, per event.~~
- ~~_____ (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~_____ (4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~_____ (5) Operator standard operating procedures (SOP).~~
- ~~_____ (6) Manufacturer's specifications or its equivalent.~~
- ~~_____ (7) Equipment "troubleshooting" contingency plan.~~
- ~~_____ (8) Documentation of the dates vents are redirected.~~
- (b)(c) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10 and the dates the vents are redirected.**
- (c)(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Upon further review, the OAM has decided to make the following revisions to the permit:

1. The expiration has been added to the signature box.

Operation Permit No.: F123-12215-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: Expiration Date:

2. A.1 (General Information) has been revised to eliminate the phone number of the contact person.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a commercial coal grinding and clay blending plant that manufactures additives.

Authorized individual:	Chuck McAulay
Source Address:	Tell City Industrial Park, Troy, Indiana, 47588
Mailing Address:	PO Box 160, Belle Fourche, SD 57717
Phone Number:	(812) 547-3567
SIC Code:	3295
Source Location Status:	Perry
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

3. A.2 (Emission Units and Pollution Control Equipment Summary) has been revised to include the date of construction with the facility description.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) one (1) Coal bulk unloading, handling and storage operation, **constructed July 30, 1998**, with a maximum capacity of 48 tons per hour (TPH), using a baghouse (BH-13) for PM and PM10 control, and exhausting to a point designated as DC-6, inside the building;
- (e) one (1) Coal milling operation, **constructed July 30, 1998**, with a maximum capacity of 10 TPH, using a baghouse (BH-14) for PM and PM10 control, and exhausting to a point designated as DC-1, inside the building;
- (f) one (1) Coal screening operation, **constructed July 30, 1998**, with a maximum capacity of 10 TPH, using a baghouse (BH-15) for PM and PM10 control, and exhausting to a point designated as DC-7, inside the building;
- (g) one (1) Raw materials unloading operation, **constructed July 30, 1998**, with a maximum

capacity of 32 TPH, using a baghouse (BH-01) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-5;

- (h) one (1) Raw materials storage tank identified as Tank A, **constructed July 30, 1998**, with a maximum capacity of 32 TPH, using a baghouse (BH-02) for PM and PM10 control, and exhausting to a point designated as BV-A, inside the building;
 - (i) one (1) Raw materials storage tank identified as Tank C, **constructed July 30, 1998**, with a maximum capacity of 32 TPH, using a baghouse (BH-03) for PM and PM10 control, and exhausting to a point designated as BV-C, inside the building;
 - (j) one (1) Raw materials storage tank identified as Tank B&D, **constructed July 30, 1998**, with a maximum capacity of 32 TPH, using a baghouse (BH-04) for PM and PM10 control, and exhausting to a point designated as BV-BD, inside the building;
 - (k) one (1) Elevator Conveyer identified as # 1, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-17) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-1;
 - (l) one (1) Elevator Conveyer identified as # 2, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-18) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-2;
 - (m) one (1) Blender/Lump breaker operation, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-05) for PM and PM10 control, and exhausting to a point designated as DC-4 inside the building;
 - (n) one (1) Materials transfer operation, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-12) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-8;
 - (o) one (1) Blender elevator, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-06) for PM and PM10 control, and exhausting to a point designated as BV-3, inside the building;
 - (p) one (1) Outbound storage tank, **constructed July 30, 1998**, with a maximum capacity of 35 TPH, using a baghouse (BH-789) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-4;
 - (q) One (1) Product loadout operation, **constructed July 30, 1998**, with a maximum capacity of 100 TPH, using a baghouse (BH-10) for PM and PM10 control, and exhausting to a point designated as DC-3, inside the building; and
 - (r) One (1) Packaging operation, **constructed July 30, 1998**, with a maximum capacity of 7 TPH, using a baghouse (BH-11) for PM and PM10 control, and exhausting to one (1) stack, designated as DC-2.
4. B.3 (Permit Term) has been revised to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be 5 years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

5. B.8 (Duty to Supplement and Provide Information) has been revised to provide greater consistency with the language in the rule.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
[326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). **Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit.~~ The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. ~~If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** furnishing copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA.~~ The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
6. B.10 (Compliance with Permit Conditions) has been revised to include new paragraph (c) to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures.
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
-
- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, ~~constitutes a violation of the Clean Air Act and is grounds for:~~
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and

- (3) Denial of a permit renewal application.
 - (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
 - (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**
7. B.11 (Certification) paragraph (b) has been modified to clarify when a certification is needed.
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**
- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
 - (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.
 - (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).
8. B.12 (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until December 31. Paragraph (c) has been revised to provide greater consistency with the language in the rule.
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**
- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** The certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
9. B.14 (Emergency Provisions) has been revised at paragraph B.14(b)(5) to include a reference to the Emergency Occurrence Report Form. The emergency form is for emergencies only-, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Also, paragraph (d) has been revised to remove extraneous language, and in paragraph (f) Acompliance@ has been changed to Aaccordance@.
- B.14 Emergency Provisions [326 IAC 2-8-12]**

-
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** ~~notice either in writing by mail or facsimile, of the emergency to:~~

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

10. B.15 (Deviations from Permit Requirements and Conditions) has been revised to eliminate the requirement for sources to report deviations in 10 days. Sources are now required to report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will no longer be reported on that form. Further there is no longer a 5% exception for reporting deviations, since the previous 10 day notification requirement has been changed to a less burdensome quarterly report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

-
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch **Data Section**, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation, using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

- ~~(e) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

11. B.18 (Permit Amendment or Modification) has been revised to be consistent with 326 IAC 2-7-4(f) and clarify that all such applications be certified by the responsible official. EPA has also requested this change.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

-
- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be

submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). ~~only if a certification is required by the terms of the applicable rule.~~

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

- 12. B.20 (Permit Revision Requirement) 326 IAC 2 has been added to make the condition more complete. The language "applicable provisions" has been removed because it is unnecessary

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by ~~the applicable provisions of 326 IAC 2 and~~ 326 IAC 2-8-11.1.

- 13. B.21 (Inspection and Entry) has been revised to add the rule cite [IC 13-14-2-2] and to delete the rule cite [326 IAC 2-8-5(a)(4)].

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

14. B.22 (Transfer of Ownership or Operational Control) 326 IAC 2-8-3(d) requires all applications to be certified by the authorized individual, therefore this condition has been revised to clarify that.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

15. B.23 (Annual Fee Payment) paragraph (a) has been revised to include the appropriate rule cite.

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

16. C.6 (Operation of Equipment) has been revised to clarify the requirements of the condition.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided **by statute, rule, or** in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

17. C.7 (Stack Height) has been revised to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

18. C.8 (Asbestos Abatement Projects) has been revised to provide a more accurate rule cite.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ **[40 CFR 61, Subpart M]**

19. C.9 (Performance Testing) has been revised such that ~~A~~within@ has been changed to ~~A~~not later than@ for purposes of providing greater clarity.

C.9 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

20. C.11 (Compliance Monitoring) has been revised to clarify that the permit will specify those instances when compliance monitoring is not required to commence within a 90 day period of permit issuance. Otherwise, compliance monitoring will be required to start within the 90 day time-frame stated in the condition.

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

21. C.12 (Maintenance of Emission Monitoring Equipment) has been revised to clarify the requirements of the condition.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less **often** than ~~one (1)~~ **once an** hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

22. C.13 (Monitoring Methods) has been revised to provide additional appropriate rule cites.

C.13 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63** or other approved methods as specified in this permit.

23. C.14 (Pressure Gauge Specifications) has been revised to provide appropriate rule cites, and language has been added for other instrument specifications.

C.14 Pressure Gauge **and Other Instrument** Specifications **[326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) **The Permittee may request the IDEM, OAM approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.**

24. C.16 (Risk Management Plan) has been updated to revised the compliance schedule submission date for sources subject to the RMP requirements of 40 CFR 68.

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a);~~ or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a

certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

~~(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68 on:~~

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

25. C.17 (Compliance Monitoring Plan - Failure to Take Response Steps) has been revised to more clearly state the requirements of the condition.

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.

- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; ~~or~~
 - (3) An automatic measurement was taken when the process was not operating; ~~or~~
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
 - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~
 - ~~(1)~~ At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides such failure providing adequate justification is documented and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.**
 - ~~(2)~~ Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.
26. C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised such that ~~A~~corrective actions~~@~~ has been changed to ~~A~~response actions~~@~~ to be consistent with the rest of the permit.
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]
-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response**

actions are being implemented.

27. C.19 (General Record Keeping Requirements) has been revised such that requirements of the condition are general; Areports@ has been added to clarify that the source must keep copies of those as well; and extraneous language has been removed.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

- ~~(1) The date, place, and time of sampling or measurements;~~
~~(2) The dates analyses were performed;~~
~~(3) The company or entity performing the analyses;~~
~~(4) The analytic techniques or methods used;~~
~~(5) The results of such analyses; and~~
~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

- ~~(1) Copies of all reports required by this permit;~~
~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
~~(3) All calibration and maintenance records;~~
~~(4) Records of preventive maintenance.~~

~~(d)~~(b) **Unless otherwise specified in this permit**, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

28. D.1.12 (Broken or Failed Bag Detection) in paragraph (a) have been revised to include, language specifying that failure to take response steps will be considered a permit violation.

D.1.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) **For multi-compartment units**, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).** Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~ **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**

Forms

1. Emergency/Deviation Occurrence Report Form has been revised and is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section as previously noted. The 2 day notification can now be submitted to the Compliance Branch without the responsible official certification, as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official and, therefore, will comply with the Part 70 requirement to have all reports certified.
2. The Quarterly or Semi-Annual Compliance Monitoring Report, has been revised and is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. Every source will need to submit this report quarterly, except for sources with an applicable requirement with an alternate schedule for reporting deviations. Those sources will report deviations according to the schedule in the applicable requirement.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/~~DEVIATION~~ OCCURRENCE REPORT

Source Name: American Colloid Company
Source Address: Tell City Industrial Park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No. 2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/ Deviation :
Describe the cause of the Emergency/ Deviation :

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/ Deviation started:
Date/Time Emergency/ Deviation was corrected:
Was the facility being properly operated at the time of the emergency/ deviation ? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/ deviation :
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: American Colloid Company
Source Address: Tell City Industrial Park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

Months: to Year:

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD:

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:

Compliance Monitoring Requirement	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: American Colloid Company
Source Address: Tell City Industrial park, Troy, Indiana 47588
Mailing Address: P O Box 160, Belle Fourche, SD 57717
FESOP No.: F123-12215-00021

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: American Colloid Company
Source Location: Tell City Industrial Park, Troy, IN 47588
County: Perry
SIC Code: 3295
Operation Permit No.: F123-12215-00021
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Management (OAM) has reviewed a FESOP application from American Colloid Company relating to the operation of a commercial coal grinding and clay blending plant that manufactures additives.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) Coal bulk unloading, handling and storage operation, with a maximum capacity of 48 tons per hour (TPH), using a baghouse (BH-13) for PM and PM10 control, and exhausting to a point designated as DC-6, inside the building;
- (b) one (1) Coal milling operation, with a maximum capacity of 10 TPH, using a baghouse (BH-14) for PM and PM10 control, and exhausting to a point designated as DC-1, inside the building;
- (c) one (1) Coal screening operation, with a maximum capacity of 10 TPH, using a baghouse (BH-15) for PM and PM10 control, and exhausting to a point designated as DC-7, inside the building;
- (d) one (1) Raw materials unloading operation, with a maximum capacity of 32 TPH, using a baghouse (BH-01) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-5;
- (e) one (1) Raw materials storage tank identified as Tank A, with a maximum capacity of 32 TPH, using a baghouse (BH-02) for PM and PM10 control, and exhausting to a point designated as BV-A, inside the building;
- (f) one (1) Raw materials storage tank identified as Tank C, with a maximum capacity of 32 TPH, using a baghouse (BH-03) for PM and PM10 control, and exhausting to a point designated as BV-C, inside the building;
- (g) one (1) Raw materials storage tank identified as Tank B&D, with a maximum capacity of 32 TPH, using a baghouse (BH-04) for PM and PM10 control, and exhausting to a point designated as BV-BD, inside the building;
- (h) one (1) Elevator Conveyer identified as # 1, with a maximum capacity of 35 TPH, using a baghouse (BH-17) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-1;

- (i) one (1) Elevator Conveyor identified as # 2, with a maximum capacity of 35 TPH, using a baghouse (BH-18) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-2;
- (j) one (1) Blender/Lump breaker operation, with a maximum capacity of 35 TPH, using a baghouse (BH-05) for PM and PM10 control, and exhausting to a point designated as DC-4 inside the building;
- (k) one (1) Materials transfer operation, with a maximum capacity of 35 TPH, using a baghouse (BH-12) for PM and PM10 control, and exhausting to one (1) stack, identified as DC-8;
- (l) one (1) Blender elevator, with a maximum capacity of 35 TPH, using a baghouse (BH-06) for PM and PM10 control, and exhausting to a point designated as BV-3, inside the building;
- (m) one (1) Outbound storage tank, with a maximum capacity of 35 TPH, using a baghouse (BH-789) for PM and PM10 control, and exhausting to one (1) stack, identified as BV-4;
- (n) one (1) Product loadout operation, with a maximum capacity of 100 TPH, using a baghouse (BH-10) for PM and PM10 control, and exhausting to a point designated as DC-3, inside the building; and
- (o) one (1) Packaging operation, with a maximum capacity of 7 TPH, using a baghouse (BH-11) for PM and PM10 control, and exhausting to one (1) stack, designated as DC-2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP-123-9190-00021, issued on April 16, 1998;
- (b) First Permit Modification CP-123-10460-00021, issued on April 26, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

CP 123-9190-00021, issued on April 16, 1998.

Condition 8: That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4.

Reason not incorporated: This source is not subject to 326 IAC 2-2 (Emission Reporting), which would require the source to submit an annual emission statement. This source, which is located in Perry County, has accepted federally enforceable operation conditions which limit emissions of PM10 to below 100 tons per year. The potential to emit of all other regulated pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on April 28, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (2 pages)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	88,905.2
PM-10	75,764.4
SO ₂	0
VOC	0
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	38.99
PM-10	0.0
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0
HAP	0.0

Limited Potential to Emit

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coal unloading, handling and storage operation (DC-6)	2.50	2.50	--	--	--	--	--
Coal milling operation (DC-1)	2.32	2.32	--	--	--	--	--
Coal screening operation (DC-7)	2.50	2.50	--	--	--	--	--
Raw materials unloading operation (DC-5)	1.80	1.80	--	--	--	--	--
Raw materials storage tank A (BV-A)	0.74	0.74	--	--	--	--	--
Raw materials storage tank C (BV-C)	0.74	.74	--	--	--	--	--
Raw materials storage tank B&D (BV-BD)	0.74	0.74	--	--	--	--	--
Elevator conveyer # 1 (BV-1)	0.44	0.44					
Elevator conveyer # 2 (BV-2)	0.44	0.44					
Blender/lump breaker operation (DC-4)	0.74	0.74					
Materials transfer operation (DC-8)	0.87	0.87					
Blender elevator (BV-3)	0.44	0.44					
Outbound storage tanks (BV-4)	0.66	0.66					
Product loadout operation (DC-3)	0.74	0.74					
Packaging operation (DC-2)	1.8	1.8					
Total (tons/yr)	17.47	17.47	--	--	--	--	--

Note: (1) The sourcewide PM emissions from the above listed facilities shall be controlled to less than 250 tons/yr by using baghouses as control. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.
(2) Pursuant to 326 IAC 2-8, the source wide PM10 emissions from the above listed facilities shall be controlled to less than 100 tons/yr by using baghouses as control. Therefore, the requirements of 326 IAC 2-7 do not apply.

County Attainment Status

The source is located in Perry County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) This coal preparation plant is subject to the New Source Performance Standards, 326 IAC 12, and 40 CFR 60.250 through 60.254, Subpart Y. This rule requires that the permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage systems, or coal transfer and loading system, processing coal gases which exhibit 20 percent opacity or greater.
- (b) This fixed nonmetallic mineral processing plant is subject to the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.670 through 60.676, Subpart OOO. This rule requires the particulate emissions from:
- (1) Exhausts DC-5, BV-A, BV-C, BV-BD, BV-1, BV-2, DC-04, DC-08, BV-3, BV-04, DC-3, and DC-2 shall be limited to:
- (A) 0.05 g/dscm; and
- (B) 7 percent opacity
- (2) Transfer points fugitive emissions shall be limited to 10 % opacity.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source under 326 IAC 2-2 (PSD) because the potential to emit for any regulated pollutant is limited to less than 250 tons per year, and it is not one of the twenty-eight (28) listed sources.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source, which is located in Perry County, has accepted federally enforceable operation conditions which limit emissions of PM-10 to below 100 tons per year. The potential to emit of all other regulated pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source will limit sourcewide PM10 emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), the particulate matter (PM) emissions from the following processes shall be limited by the following equations:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Controlled PM Emissions (lb/hr)	Allowable PM Emissions 326 IAC 6-3-2 (lb/hr)	Truncated Allowable PM Emissions (lb/hr)	Allowable PM-10 Emissions (lb/hr)
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Coal unloading, handling and storage operation (DC-6)	48	3648	0.57	44.2	29.25 (1)	10.87 (3)
Coal milling operation (DC-1)	32	760	0.53	19.1	12.64 (1)	4.70 (3)
Coal screening operation (DC-7)	32	760	0.57	19.1	12.64 (1)	4.70 (3)
Raw materials unloading operation (DC-5)	32	1088	0.41	40.5	0.41 (2)	0.41
Raw materials storage tank A (BV-A)	32	1088	0.17	40.5	0.17 (2)	0.17
Raw materials storage tank C (BV-C)	32	1088	0.17	40.5	0.17 (2)	0.17
Raw materials storage tank B&D (BV-BD)	32	1088	0.17	40.5	0.17 (2)	0.17
Elevator conveyer # 1 (BV-1)	35	1190	0.10	41.3	0.10 (2)	0.10
Elevator conveyer # 2 (BV-2)	35	1190	0.10	41.3	0.10 (2)	0.10
Blender/lump breaker operation (DC-4)	35	1190	0.17	41.3	0.17 (2)	0.17
Materials transfer operation (DC-8)	35	1190	0.20	41.3	0.20 (2)	0.20
Blender elevator (BV-3)	35	1190	0.10	41.3	0.10 (2)	0.10
Outbound storage tanks (BV-4)	35	1190	0.15	41.3	0.15 (2)	0.15
Product loadout operation (DC-3)	100	3400	0.17	51.3	0.17 (2)	0.17
Packaging operation (DC-2)	7	238	0.41	15.1	0.41 (2)	0.41
Total (lb/hr)			3.99	558.6	56.85	22.59

Note: (1) PM allowable emissions for these facilities are truncated from 326 IAC (6-3-2) allowable PM emissions, such that the source wide PM emissions are less than 250 tons/yr to ensure that the requirements of 326 IAC 2-2 (PSD) do not apply.
(2) PM allowable emissions based on 40 CFR 60.670, Subpart OOO, PM emission limit of 0.022 gr/dscf.
(3) PM10 allowable emissions for these facilities are truncated, such that the source wide PM10 emissions are less than 100 tons/yr to ensure that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

Testing Requirements

Testing for Coal unloading, handling and storage operation (DC-6) is required, because the facility accounts for greater than 40 % of sourcewide allowable PM emissions. Initial testing for other facilities regulated by 40 CFR 60, subpart OOO is not required, because an initial compliance test pursuant to NSPS testing requirements was conducted on Jan 20, 1999. Test

result indicated the facilities are in compliance with Permit limits (CP 123-9190).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) The coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyer, blender elevator, outbound storage tank, product loadout and packaging facilities have applicable compliance monitoring conditions as specified below:
 - (a) The baghouses for PM control shall be in operation at all times when the facilities are in operation.
 - (b) The Permittee shall record the total static pressure drop across each of the baghouses used in conjunction with the facilities, at least once per working shift when the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyers, blender elevator, outbound storage tank, product loadout and packaging facilities are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
 - (c) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
 - (d) An inspection shall be performed each calendar quarter of all bags controlling the operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

- (e) Daily visible emission notations of the raw materials unloading (DC-5), materials transfer (DC-8), elevator conveyers (#1 (BV-1) and # 2 (BV-2)), outbound storage tank (BV-4), and packaging (DC-2) facilities stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring requirements are necessary because the baghouses for the coal bulk unloading, handling and storage, coal milling, coal screening, raw materials storage and unloading, blender/lump breaker, materials transfer, elevator conveyor, blender elevator, outbound storage tank, product loadout and packaging facility must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), New Source Performance Standards 40 CFR 60.250 through 60.254, Subpart Y, and 40 CFR 60.670, Subpart OOO, 326 IAC 2-8 (Federally Enforceable State Operating Permit Program), and also to ensure that the requirements of 326 IAC 2-7 (Title V) do not apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this coal grinding and clay blending operation shall be subject to the conditions of the attached proposed **FESOP No.: F123-12215-00021**.

Appendix A: Air Pollutant Emissions

Page 1 of 2 TSD App A

Company Name: American Colloid Co.
Address City IN Zip: Tell City Industrial Park, Troy, IN 47588
Permit No./Plt ID: F123-12215-00021
Reviewer: Adeel Yousuf / EVP
Date: 07/19/2000

S/V ID	Unit ID	Air Pollutant	Max. Process Rate ton/hr	Air Flow dscfm	Grain Loading gr/dscf	Control Efficiency %	Emission Factor * lb/ton	Emissions Factor Reference	Potential Emissions		Controlled		Allowable Emissions lb/hr
									lb/hr	ton/yr	lb/hr	ton/yr	
DC-6	BH-13												
	Inside Vent	PM	48	2160	0.031	99.99%	76	FIRE 30500802	3648	15978	0.57	2.50	29.25 (c)
		PM 10	48	2160		99.99%	64.6	FIRE 30500802	3100.8	13582	0.57	2.50	a
DC-1	BH-14												
	Inside Vent	PM	10	1980	0.031	99.99%	76	FIRE 30500802	760	3328.8	0.53	2.32	12.64 (c)
		PM 10	10	1980		99.99%	64.6	FIRE 30500802	646	2829.5	0.53	2.32	a
DC-7	BH-15												
	Inside Vent	PM	10	2160	0.031	99.99%	76	FIRE 30500802	760	3328.8	0.57	2.50	12.64 (c)
		PM 10	10	2160		99.99%	64.6	FIRE 30500802	646	2829.5	0.57	2.50	a
DC-5	BH-01				b								
		PM	32	2160	0.022	99.99%	34	FIRE 30500803	1088	4765.4	0.41	1.80	0.41
		PM 10	32	2160		99.99%	29	FIRE 30500803	928	4064.6	0.41	1.80	a
BV-A	BH-02				b								
	Inside Vent	PM	32	900	0.022	99.99%	34	FIRE 30500803	1088	4765.4	0.17	0.74	0.17
		PM 10	32	900		99.99%	29	FIRE 30500803	928	4064.6	0.17	0.74	a
BV-C	BH-03				b								
	Inside Vent	PM	32	900	0.022	99.99%	34	FIRE 30500803	1088	4765.4	0.17	0.74	0.17
		PM 10	32	900		99.99%	29	FIRE 30500803	928	4064.6	0.17	0.74	a
BV-BD	BH-04				b								
	Inside Vent	PM	32	900	0.022	99.99%	34	FIRE 30500803	1088	4765.4	0.17	0.74	0.17
		PM 10	32	900		99.99%	29	FIRE 30500803	928	4064.6	0.17	0.74	a
BV-1	BH-17				b								
		PM	35	529.2	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.10	0.44	0.10
		PM 10	35	529.2		99.99%	29	FIRE 30500803	1015	4445.7	0.10	0.44	a

S/V ID	Unit ID	Air Pollutant	Max. Process Rate ton/hr	Air Flow dscfm	Grain Loading gr/dscf	Control Efficiency %	Emission Factor * lb/ton	Emissions Factor Reference	Potential Emissions		Controlled Emissions		Allowable Emissions lb/hr
									lb/hr	ton/yr	lb/hr	ton/yr	
BV-2	BH-18				b								
		PM	35	529.2	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.10	0.44	0.10
		PM 10	35	529.2		99.99%	29	FIRE 30500803	1015	4445.7	0.10	0.44	a
DC-4	BH-05				b								
Inside Vent		PM	35	900	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.17	0.74	0.17
		PM 10	35	900		99.99%	29	FIRE 30500803	1015	4445.7	0.17	0.74	a
DC-8	BH-12				b								
		PM	35	1085	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.20	0.88	0.20
		PM 10	35	1085		99.99%	29	FIRE 30500803	1015	4445.7	0.20	0.88	a
BV-3	BH-06				b								
Inside Vent		PM	35	529.2	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.10	0.44	0.10
		PM 10	35	529.2		99.99%	29	FIRE 30500803	1015	4445.7	0.10	0.44	a
BV-4	BH-789				b								
		PM	35	810	0.022	99.99%	34	FIRE 30500803	1190	5212.2	0.15	0.66	0.15
		PM 10	35	810		99.99%	29	FIRE 30500803	1015	4445.7	0.15	0.66	a
DC-3	BH-10				b								
Inside Vent		PM	100	900	0.022	99.99%	34	FIRE 30500803	3400	14892	0.17	0.74	0.17
		PM 10	100	900		99.99%	29	FIRE 30500803	2900	12702	0.17	0.74	a
DC-2	BH-11				b								
		PM	7	2160	0.022	99.99%	34	FIRE 30500803	238	1042.4	0.41	1.80	0.41
		PM 10	7	2160		99.99%	29	FIRE 30500803	203	889.14	0.41	1.80	a

Total PM (ton/yr)		88905		17.49
Total PM10 (ton/yr)		75764		17.50

METHODOLOGY

*Emission Factors are default values for Ceramic clay/Tile Manufacture (Grinding and Storage). The values are listed in FIRE Version 5.0

(a) Pursuant to 326 IAC 2-8, the source wide PM10 allowable emissions shall be limited to 22.6 lb/hr (99 ton/yr)

(b) Grain loading based on 0.05 g/dscm (NSPS Subpart OOO 0.022 gr/dscf)

(c) PM emissions from Coal Unloading, handling and storage, coal milling and coal screening operations are truncated from 326 IAC (6-3-2)

allowable PM emissions, such that the source wide PM emission is less than 250 tons/yr to ensure that the requirements of 326 IAC 2-2 (PSD) do not apply.

Potential Emissions, lbs/hr = Max. process Rate (ton/hr) x Emissions Factor (lb/ton)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Controlled Emissions, lbs/hr = Grain Loading (gr/dscf) x Air Flow (dscfm) x 60 (min/hr) x 1/7000 (lb/gr)

Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Allowable Emissions, lbs/hr = Grain Loading (gr/dscf) x Air Flow (dscfm) x 60 (min/hr) x 1/7000 (lb/gr)